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September 6, 2023

Tennille Smith Parker, Director
Office of Disaster Recovery
U.S. Department of Housing and Urban Development
451 7th Street, Room 782
Washington, D.C. 20410

RE: HUD Grant No. B-19-DF-40-0001; CDBG Disaster Recovery Monitoring Review and Response

Dear Ms. Parker:

Please find this letter as the Oklahoma Department of Commerce (ODOC)'s response to the HUD Monitoring Report and Cover Letter received by email on August 10, 2023, for the onsite monitoring performed by your staff during the week of June 5 – June 9, 2023.

HUD FINDINGS ADDRESSED:

HUD Finding #1: Grantee did not incorporate disaster recovery needs into the Consolidated Plan.

Corrective Action: The Department acknowledges that the guidance Oklahoma received was unclear regarding Consolidated Plan requirements. The Department will close the Finding once ODOC incorporates its disaster related needs into its Consolidated Plan in its next update and provide a copy of the Consolidated Plan to the HUD CPD Specialist assigned to manage the CDBG-DR grant. The Department understands that the grantee is creating its FY24-28 plan now and will likely complete this update by April 1, 2024.

ODOC Response: ODOC staff completed this request by incorporating the 2019 Disaster Recovery unmet needs data as a non-substantial amendment to the FY23 Action Plan update evidenced by Attachment A. This data has also been posted to our website for public review. In addition, ODOC will incorporate future disaster related needs into its Consolidated Plan.

HUD CONCERNS ADDRESSED:

Concern #1: Subrecipient activity files under the Public Facilities and Public Improvements Program did not include documentation identified in the grantee's program guidelines.

Recommended Corrective Action: The grantee should review each subrecipient application file to ensure the required documentation are included and support the capacity assessment and

procurement requirements for each of the funded activities, as well as any other documentation that is required under ODOC's program guidelines.

ODOC Response: ODOC staff has already begun the process of improving its policies and procedures, as well as educating its subrecipients to ensure all required and supporting documentation is submitted in accordance with program guidelines.

ODOC appreciates HUD's close partnership in the Disaster Recovery program. Our office has already benefited from HUD's feedback and guidance, and we look forward to utilizing future feedback for the benefit of our program and its beneficiaries.

Sincerely,

A handwritten signature in black ink that reads "Marshall L. Vogts". The signature is written in a cursive style with a large, stylized 'M' and 'V'.

Marshall Vogts, Director
Community Development Services

Attachments:
2023 Action Plan Update to 2019-2023 Consolidated Plan